

Company: San Diego Gas & Electric Company (U 902 E)
Proceeding: Real Time Pricing Pilot Rate
Application: A.21-12-006/A.21-12-008
Exhibit: SDG&E-XX

PREPARED REBUTTAL TESTIMONY OF
ERIC DALTON (CHAPTER 7)
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

January 30, 2023



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1 UCAN notes, a memorandum account without a cap would allow for adequate customer
2 enrollment and would avoid potential delays in implementation.³ Further, a “memorandum
3 account would allow the Commission to review whether the dollars spent were prudent prior to
4 rate recovery.”⁴

5 **III. SUMMARY AND CONCLUSION**

6 For the reasons stated above, a memorandum account, without a cap, is reasonable and
7 appropriate for purposes of SDG&E’s proposed RTP Pilot programs and Commodity Export
8 Compensation Pilot program. Accordingly, SDG&E respectfully requests approval to establish
9 an uncapped memorandum account to record the authorized revenue requirement and actual
10 incremental costs associated with the RTP Pilot and the Commodity Export Compensation Pilot.

11 This concludes my prepared rebuttal testimony.

recording of costs for both the import and export rate. *See* Cal Advocates Prepared Testimony of Thomas Brawley (Chapter 2) at 2-1, FN 100.

³ Direct Testimony of Mary Neal on Behalf of UCAN at 23.

⁴ *Id.*